



ROBINSON MCFADDEN
ATTORNEYS AND COUNSELORS AT LAW

ROBINSON, MCFADDEN & MOORE, P.C.

COLUMBIA | GREENVILLE

February 7, 2007

VIA ELECTRONIC FILING
& HAND DELIVERED ORIGINAL

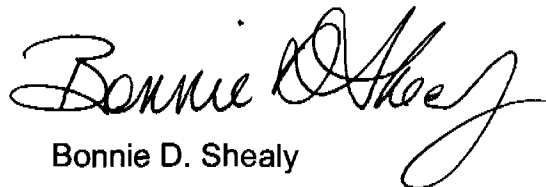
Mr. Charles Terreni
Chief Clerk of the Commission
Public Service Commission of South Carolina
Synergy Business Park, Saluda Building
101 Executive Center Drive
Columbia, SC 29210

**Re: Universal Service Fund – 2007 Docket
CompSouth
Docket No. 1997-239-C**

Dear Mr. Terreni:

Enclosed for filing please find Competitive Carriers of the South Inc.'s petition to intervene in the above referenced docket. By copy of this letter we are serving the same on all interested parties. Please date stamp the extra copy of the petition and return it with our courier. Should you have any questions, please contact me.

Very truly yours,



Bonnie D. Shealy

/bds
Enclosure

cc/enc: Ms. Carolyn Marek (via email)
Ms. Susan Berlin (via email)
Dan F. Arnett, Chief of Staff of ORS (via email & U.S. Mail)
All parties of record

**THIS DOCUMENT IS AN EXACT DUPLICATE, WITH THE EXCEPTION
OF THE FORM OF THE SIGNATURE, OF THE E-FILED COPY SUBMITTED
TO THE COMMISSION IN ACCORDANCE WITH ITS ELECTRONIC FILING INSTRUCTIONS**

**BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 1997-239-C**

IN RE:

Intrastate Universal Service Fund

**PETITION TO INTERVENE ON
BEHALF OF
COMPSOUTH**

Competitive Carriers of the South, Inc.¹ ("CompSouth" or Petitioner") hereby petitions the Public Service Commission of South Carolina ("Commission") pursuant to S.C. Code Section 58-9-280, 26 S.C. Regs. 103-836 and other applicable rules and regulations for permission to intervene in the above captioned proceeding. In support of this petition, CompSouth would show the following:

1. CompSouth is a nonprofit association established to further the interests of competitive telecommunications providers throughout the southeastern states.
2. CompSouth's authorized representatives in this proceeding are as follows:

Frank R. Ellerbe, III, Esquire
Bonnie D. Shealy, Esquire
Robinson, McFadden & Moore, P.C.
1901 Main Street, Suite 1500
Post Office Box 944
Columbia, South Carolina 29202
Telephone: 803-779-8900
fellerbe@robinsonlaw.com
bshealy@robinsonlaw.com

¹ CompSouth's members include the following companies: ACCESS Integrated Networks, Inc.; Access Point Inc.; Cavalier Telephone; Cbeyond Communications; Covad Communications Co.; Dialog Telecommunications, Inc.; FDN Communications; deltagom; Level 3 Communications; Momentum Telecom, Inc.; NuVox Communications, Inc.; Time Warner Telecom of S.C., LLC; and XO Communications.

3. The Commission has scheduled a hearing to address proposed modifications to the Guidelines for the South Carolina Universal Service Fund for April 19, 2007.

4. CompSouth has an interest in the Universal Service Fund proceeding since a large number of its members are providers and potential providers of competitive local exchange and interexchange telecommunications services in South Carolina. As providers of telecommunications services in South Carolina, CompSouth's members are required to contribute in the state universal service fund and will be affected by decisions made in this docket. Therefore, its members have a substantial interest in this docket.

5. CompSouth seeks to participate in the development of modifications to the Guidelines and will advocate its position with respect to those issues presented during this proceeding. CompSouth's intervention is necessary to protect the interests of its members.

6. CompSouth requests permission to intervene in the above-captioned proceeding as a formal party of record. CompSouth requests that the Commission permit it to intervene out of time in this proceeding since CompSouth was not an organized entity at the time for intervening which elapsed several years ago. At this time, CompSouth is unable to access the length of time that it may require to make its presentation to the Commission, but does not anticipate that it will exceed one to two hours.

7. CompSouth's intervention will aid the Commission by assisting in the development of a full and fair record to address the issues raised in this proceeding.

CompSouth's intervention will not in any way delay the proceedings in this docket.

6. CompSouth is informed and believes that granting its request to be made a party of record in the above-captioned proceeding is in the public interest, is consistent with the policies of the Commission in encouraging maximum public participation in the issues before it, and should be allowed so that a full and complete record addressing the views and concerns of CompSouth can be developed.

WHEREFORE, CompSouth prays for the following relief:

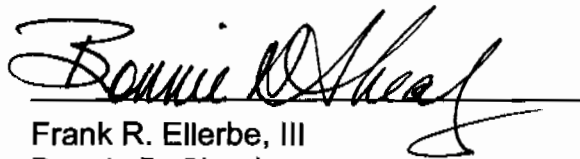
A. That this petition to intervene be granted by the Commission and that the CompSouth be made a formal party of record to the proceeding.

B. That CompSouth be allowed to participate fully in this proceeding and to take such positions as it deems advisable.

C. That such other and further relief be granted as is just and proper.

Dated this 7th day of February, 2007

ROBINSON, MCFADDEN & MOORE, P.C.



Frank R. Ellerbe, III
Bonnie D. Shealy
Post Office Box 944
Columbia, SC 29202
Telephone (803) 779-8900
fellerbe@robinsonlaw.com
bshealy@robinsonlaw.com

Counsel for Competitive Carriers of the South,
Inc.

IN RE:)
)
)
Intrastate Universal Service Fund)
)
)
)
)
)

This is to certify that I, Vickie V. Pietschker, a legal assistant with the law firm of Robinson, McFadden & Moore, P.C., have this day caused to be served upon the person(s) named below the **Competitive Carriers of the South Inc.'s Petition to Intervene** in the foregoing matter by placing a copy of same in the United States Mail, postage prepaid, in an envelope addressed as follows:

Robert E. Tyson, Jr., Esquire
Sowell Gray Stepp & Laffitte, LLC
Post Office Box 11449
Columbia, SC 29211

Faye A. Flowers, Esquire
Parker, Poe, Adams & Bernstein, LLP
Post Office Box 1509
Columbia, SC 29202

Darra W. Cothran, Esquire
Woodward, Cothran & Herndon
P.O. Box 12399
Columbia, SC 29211

John J. Pringle, Jr., Esquire
Ellis, Lawhorne & Sims, P.A.
Post Office Box 2285
Columbia, SC 29202

Florence P. Belser, General Counsel
Office of Regulatory Staff
Post Office Box 11263
Columbia, SC 29211

Nanette S. Edwards, Esquire
Office of Regulatory Staff
Post Office Box 11263
Columbia, SC 29211

Craig K. Davis, Esquire
1420 Hagood Avenue
Columbia, SC 29205-1327

John F. Beach, Esquire
Ellis, Lawhorne & Sims, P.A.
P.O. Box 2285
Columbia, SC 29202

M. John Bowen, Jr., Esquire
McNair Law Firm, P.A.
P.O. Box 11390
Columbia, SC 29211

Margaret M. Fox, Esquire
McNair Law Firm, P.A.
P.O. Box 11390
Columbia, SC 29211

Ross Allen Buntrock, Esquire
Womble Carlyle Sandridge & Rice, PLLC
1401 Eye Street, 17th Floor
Washington, DC 20005

Lori Reese Patton, Esquire
Womble Carlyle Sandridge & Rice, PLLC
One Wachovia Center, Suite 3500
301 S. College Street
Charlotte, NC 28202

Scott A. Elliott, Esquire
Elliott & Elliott
721 Olive Street
Columbia, SC 29205


Steven W. Hamm, Esquire
Richardson Plowden Carpenter & Robinson, PA
1900 Barnwell Street
P.O. Drawer 7788
Columbia, SC 29202-7788

John M.S. Hoefer, Esquire
Willoughby & Hoefer, P.A.
1022 Calhoun Street, Suite 320
Post Office Box 8416
Columbia, SC 29202

Benjamin P. Mustian, Esquire
Willoughby & Hoefer, P.A.
Post Office Box 8416
Columbia, SC 29202-8416

Susan B. Berkowitz, Esquire
SC Appleseed Legal Justice Center
Post Office Box 7187
Columbia, SC 29202

Dated at Columbia, South Carolina this 7th day of February, 2007.


Vickie V. Pietschker